

EXHIBIT A

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January 28, 2014

VIA EMAIL

James Trump, Esquire
Assistant U.S. Attorney
Justin W. Williams United States Attorney's Building
2100 Jamieson Ave.
Alexandria, VA 22314

Re: United States v. Jeffrey A. Sterling
No. 1:10cr485 (LMB)

Dear Jim:

I hope the New Year is finding you well.

I am writing to follow up on a conversation we had after the Fourth Circuit issued an opinion in this case. I am going to be circumspect since I am not writing this letter from the SCIF and assume we can handle this in this fashion. Of course, either Barry or I can go to the SCIF and write a detailed letter if need be but I hope this will suffice in getting the ball rolling.

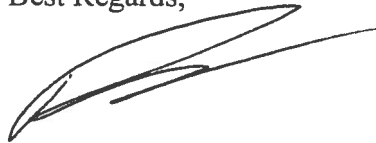
Just before the case was set for trial in the fall of 2011, we were given two letters. Each provided information about witnesses who had information that might be relevant to the impeachment of witnesses on the government's witness list. As we all know, the late provision of the identity of those witnesses, in addition to the subject matters disclosed in the letters, prompted rulings from Judge Brinkema that were subsequently the subject of a part of the appeal in this case. That ruling is not part of the pending petition for certiorari.

We need to interview all of these witnesses. Before we do that, we need to get the discovery that was previously requested regarding the information that was summarized in the letters. We seek all written documentation related to the statements that were summarized in the letters. I would also assume there is some follow-up that has been done in the last two and a half years as well. We also need the last known contact information for each of these witnesses. Once we get all that information, which we know will be in the SCIF, we can arrange to meet with these witnesses ourselves. From my recollection, the government wants all of these discussions to take place in the SCIF and we will have to coordinate that process with Christine since I do not believe we have a SCIF right now in Alexandria.

James Trump, Esquire
Assistant U.S. Attorney
January 28, 2014
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I look forward to your response.

Best Regards,

A handwritten signature in black ink, appearing to read "Edward B. MacMahon, Jr.", with a stylized, sweeping flourish extending to the right.

Edward B. MacMahon, Jr.

cc: Barry Pollack